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# **Company Vision**

At US Digital, we are committed to producing world-class products that empower our customers while honoring our values of stewardship, workplace safety, and community responsibility. We strive to create a culture where people thrive, technology advances, and quality sets the standard for manufacturing excellence.

We believe God providentially provides us with talents, abilities, and opportunities to fulfill a purpose, meet needs, and solve problems in the world around us. Our responsibility is to diligently develop these talents into productive skills and assemble resources to produce the most fruitful application of these into practical solutions. Through good stewardship, we work to make the world a better place.

# **Company Values**

Our organization is founded on the principles outlined in God's Word, which results in high employee retention, increased customer loyalty, and steadfast growth:

- Integrity is our guiding principle.
- Customer satisfaction takes precedence over profits.
- We have thoughtfully developed an exciting environment for our employees.
- We take great care of our suppliers.
- We have a relentless drive to solve customer problems.
- We challenge ourselves to be practical in all aspects of business.
- We engineer our products for durability and repeatability.
- We set our pricing to be fair and reasonable.
- We deliver our products and services to customers on their timeline.
- We embrace change as the means to continuously improve and grow.
- We strive to make it easy for people to do business with us.
- We are on a life-long journey of learning.

### **Company Mission**

Our mission is to make our customers successful by inventing, manufacturing, and quickly delivering the most practical motion control components worldwide.

# **Build Trust and Credibility**

Business success is dependent on the trust and confidence we earn from our employees, Customers, and suppliers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct.

## **Respect for the Individual**

US Digital is committed to creating an environment where we are treated with dignity and respect as it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

US Digital is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination and abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to Human Resources (HR).

All US Digital employees are expected to adhere to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation.
- Avoid slang or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Listen when given constructive feedback regarding others' perception of your conduct.

US Digital will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

# **Create a Culture of Open and Honest Communication**

At US Digital everyone should feel comfortable having an open and honest conversation. Managers have a responsibility to create an open and supportive environment where employees feel comfortable having such a conversation.

### **Reporting Concerns**

US Digital will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, US Digital's whistleblower policy is as follows:

# **Whistleblower Policy**

US Digital is committed to maintaining the highest standards of honesty, integrity, and accountability in all aspects of our operations. This policy provides employees, customers, and suppliers with a clear process to report concerns about suspected misconduct, unlawful activity, or violations of company policy without fear of retaliation.

This policy applies to all employees, officers, contractors, customers, suppliers, and applicants of US Digital.

Employees are strongly encouraged to report any activity that they reasonably believe:

- Violates federal, state, or local laws and regulations (including Washington State labor, safety, or environmental laws).
- Constitutes fraudulent financial reporting, accounting irregularities, or theft.
- Violates company policies, including health and safety requirements.

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- Represents gross mismanagement, waste of company resources, or abuse of authority.

# **Reporting Process**

<u>Internal Reporting</u> – Employees may report concerns verbally or in writing to their immediate supervisor, any member of management, or the Human Resources department.

<u>External Reporting</u> – Employees also have the right to report violations to appropriate government agencies, such as the Washington State Department of Labor & Industries (L&I), the U.S. Occupational Safety and Health Administration (OSHA), or the Equal Employment Opportunity Commission (EEOC), without first reporting internally.

## Confidentiality

To the extent possible, US Digital will maintain the confidentiality of employees who report concerns in good faith. However, disclosure may be necessary during an investigation or if required by law.

#### **Non-Retaliation**

Retaliation against any employee who, in good faith, reports suspected misconduct or participates in an investigation is strictly prohibited. Retaliation includes termination, demotion, suspension, harassment, reduction in pay, or any other adverse employment action. Any supervisor or employee found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

## Investigation

All reports will be promptly reviewed and, when appropriate, investigated. Employees are expected to cooperate fully during any investigation. Findings will be addressed in a timely and appropriate manner, consistent with applicable laws and company policy.

#### **Good Faith Requirement**

Employees who report concerns are expected to act in good faith, with reasonable grounds for believing the information disclosed indicates a violation. Reports made maliciously, knowingly false, or with reckless disregard for the truth may result in disciplinary action.

Employees are encouraged to address issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, US Digital's owner and company President, David Madore operates with an open-door policy.

### **Leading by Example**

Managers and HR are committed to promptly and responsibly addressing ethical questions or concerns raised by employees and taking appropriate action. Management has the added responsibility for demonstrating through their actions the importance of the code of conduct in this policy. We believe ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled within all levels of leadership and demonstrated by example.

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#### **Uphold the Law**

US Digital is committed to integrity in complying with laws, rules and regulations in business. Further, we understand the importance of adhering to the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure whether an action is permitted by law or US Digital policy, employees are encouraged to seek advice from the resource expert. All employees are responsible for preventing violations of law and for speaking up if we see possible violations.

# Competition

US Digital is dedicated to ethical and fair competition. We will sell US Digital products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for US Digital or the sales of its products or services, nor will we engage or assist in unlawful boycotts of customers.

# **Proprietary Information**

It is important that US Digital employees respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

#### **Selective Disclosure**

US Digital will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to US Digital, its securities, business operations, plans, financial condition, results of operations or any development plan. We strive to be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

#### **Health and Safety**

US Digital is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department.

### **Avoid Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. We must never use US Digital property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with US Digital.

# Here are some other ways in which conflicts of interest could arise:

- 1. Being employed (you or a close family member) by, or acting as a consultant to a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with US Digital.
- 2. Hiring or supervising family members or closely related people.
- 3. Serving as a board member for an outside commercial company or organization.
- 4. Owning or having a substantial interest in a competitor, supplier or contractor.
- 5. Having a personal interest, financial interest or potential gain in any US Digital transaction.

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- 6. Placing company business with a firm owned or controlled by a US Digital employee or his or her family.
- 7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all US Digital employees.

Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

# Gifts, Gratuities and Business Courtesies

US Digital is committed to competing solely on the merit of our products and services. We work to avoid actions that create a perception that favorable treatment of outside entities by US Digital was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom US Digital does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of US Digital or customers, or would cause embarrassment or reflect negatively on US Digital's reputation.

### Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier.

#### **Gifts**

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of <u>nominal value</u>, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom US Digital does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$25 may not be accepted unless approval is obtained from HR.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

### **Offering Business Courtesies**

Any employee who offers a business courtesy must ensure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon US Digital. An employee may never use personal funds or resources to do something that cannot be done with US Digital resources. Accounting for business courtesies must be done in accordance with approved company procedures.

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We may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected in the books and records of US Digital.

# **Set Metrics and Report Results Accurately**

#### **Accurate Public Disclosures**

US Digital will make certain all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including executives, with responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform US Digital CEO, David Madore, or Human Resources if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

## **Corporate Recordkeeping**

We create, retain and dispose of our company records as part of our normal course of business in compliance with all US Digital policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with US Digital's and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of US Digital books, records, processes or internal controls.

#### **Promote Substance Over Form**

US Digital is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Although US Digital's guiding principles cannot address every issue or provide answers to every situation, the intent of this code of conduct is to define the spirit in which we intend to do business. It is our intention to always do the right thing and perform our business with integrity.

#### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this code of conduct and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the code of conduct, we must contact the HR department.

US Digital takes seriously the standards set forth in the code of conduct, and violations are cause for disciplinary action up to and including termination of employment.

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## **Confidential and Proprietary Information**

Integral to US Digital's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

# **Use of Company Resources**

Company resources, including time, material, equipment and information, are provided for company business use. Employees are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

To protect the interests of the US Digital network and our fellow employees, US Digital reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or US Digital's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Questions about the proper use of company resources should be directed to your manager.

### **Media Inquiries**

From time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, please direct all media inquiries to Human Resources. Other than regular product press releases, no one may issue a press release without first consulting Human Resources or US Digital's CEO, David Madore.

### **Information and Resources**

David Madore
US Digital Owner and CEO
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